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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C 20554

In the Matter of

Administration of the
North American Numbering Plan

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)
)

CC Docket No. 92-237
Phase I

REPLY COMMENTS OF
AD HOC TELECOMMUNICATIONS USERS COMMITTEE

Economic Consultant:

Dr. Lee L. Selwyn
Economics and Technology, Inc.
One Washington Mall
Boston, Massachusetts 02108
(617) 227-0900

James S. Blaszk
Gardner, Carton & Douglas
1301 K Street, NW
Washington, DC 20005
(202) 408-7100

February 24, 1993

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Attachment 1:

Compilation of dialing
patterns in each NPA

Attachment 2:

AT&T prices for
reprogramming and updating
of AT&T PBXs to
accommodate INPA

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REPLY COMMENTS OF
AD HOC TELECOMMUNICATIONS USERS COMMITTEE

The Ad Hoc Telecommunications Users Committee ("Ad Hoc Committee" or "Committee") hereby submits its reply comments in Phase I of the Commission's Notice of Inquiry, FCC 92-470 (released October 29, 1992) ("NOI" or "Notice") in the above-captioned proceeding.

1. The initial comments generally ignore the concerns of users of PSTN and other services that are directly and significantly impacted by numbering policies.

Phase I of this NOI seeks comments regarding the future administration of the North American Numbering Plan ("NANP") and certain other specific numbering issues.¹ A number of parties, representing several key industry segments, filed comments. The Ad Hoc Committee was, however, particularly disappointed to discover that it was the only party filing substantive comments on behalf of users of PSTN and other services that are directly and significantly impacted by numbering policies.²

1/ These are PCS numbering and Local Number Portability. NOI, paras. 40, 41.

2/ The only other "user" party to file comments was Arinc/ATA. NARUC and several state commissions also filed limited comments that at best raised, but generally failed to document, certain general user/consumer concerns.

Predictably, the RBOC and other LEC comments generally defended Bellcore's practices, policies and actions in carrying out its NANPA functions, and supported retention of Bellcore's role as NANPA.³ Some LECs, however, indicated that they would not oppose a shift to a neutral party.⁴

Not surprisingly, virtually every other (non-LEC) party called for the removal of the NANPA function to a "neutral" third party, citing concerns ranging from "appearance of conflict of interest" to outright anticompetitive practice.⁵ The Ad Hoc Committee, however, did more. It informed the Commission as to specific serious and fundamental deficiencies in the present structure and practice of the NANP administration.

3/ See, e.g., Cincinnati Bell, at 2-4; NYNEX at 4-5; Rochester at 2; GTE at 5; Ameritech at 18; Bell Atlantic at 1; Pacific at 3.

4/ See, e.g., Cincinnati Bell at 3; Bell Atlantic at 1; GTE at 5; BellSouth at 6.

5/ For example, Arinc, at 2, states, "It only makes sense in this increasingly competitive telecommunications environment that such a self-interested entity [Bellcore] not be charged with the responsibility for allocating and assigning a resource that is necessary to the participation of every entity in the telecommunications marketplace." Similarly, MFS, at 3, asserts that "These administrative arrangements unavoidably entail a significant potential for conflicts of interest, since Bellcore's owners are themselves both users of numbering resources and competitors of other users." MCI, by contrast, is far more specific in its criticism of Bellcore's role as NANPA: "Bellcore should not continue to administer the NANP because of the many deficiencies in its past performance. MCI has previously cited examples of Bellcore's discriminatory assignment priorities, its unwillingness to assign service codes for uses other than those of its owners, the RBOCs, and its delay in initiating resolution of pressing policy issues. ... Bellcore has shown a propensity to favor its owners when contention arises over these limited numbering resources." MCI at 2-3.

2. It is not sufficient merely to transfer the Bellcore NANPA function to a third party; the decentralized number administration responsibilities currently assigned to the LECs must also be moved to the same neutral entity.

Perhaps because the NOI focused principally upon Bellcore's role as NANPA, most parties — LEC and non-LEC alike — generally failed to recognize the fact that NANP administration is not the sole responsibility of Bellcore, but is in fact shared on a highly decentralized and largely uncoordinated basis by Bellcore and the dominant LEC in each geographic NPA. For the various reasons discussed at length in its Initial Comments,⁶ the Ad Hoc Committee cannot agree with those parties who have lauded or extolled the present NANPA arrangement.⁷ Indeed, while the NANP provides an appearance of consistency and uniformity (in that all NANP numbers are comprised of a 3-digit area code or SAC plus a 7-digit "local" telephone number), as the Committee noted in its Initial Comments, the actual assignment and administration of CO codes within NPAs, and the dialing patterns required to be used in the various LEC territories, are anything but uniform or standard.⁸ Indeed, the magnitude of variation in the dialing patterns extant across the NANP is highlighted in a 1990 Bellcore compilation, Attachment 1 hereto, which was provided recently by the Diamond State Telephone Company in response to an information request propounded by the Delaware Office of Public Advocate in

6/ Ad Hoc Committee Initial Comments at 7-15.

7/ NARUC, for example, describes the Bellcore administration of the NANP as "excellent." NARUC at 4. For the various reasons discussed in its Initial Comments, the Committee does not agree that Bellcore's actions to date deserve such adulation.

8/ Ad Hoc Committee Initial Comments at 9.

DPSC Docket 92-47.⁹ As this tabulation shows, there is wide variation across individual NPAs with respect to mandatory and permissive dialing patterns both for DDD and for operator access.

Note that Attachment 1 was obtained through discovery in a contested proceeding; NANPA does not generally distribute this type of information beyond its LEC sponsors. Indeed, the publication and general availability of such compilations by NANPA would be of considerable assistance to all NANP stakeholders; however, the Ad Hoc Committee is not aware of any more recent release of this two-year-old document. The Committee is also not aware of any similar compilation of CO code assignments made for special (non-geographic) purposes by individual LECs. Thus, not only has the Bellcore NANP administration failed to establish or enforce uniform numbering and dialing pattern standards, it does not even serve as a central clearing house for current information on the disparate actions of its owners and others having NPA-level NANP administrative responsibility.

There can be no question but that the reticence of Bellcore and the LECs even to disseminate NANP planning and other information to the industry at large is motivated by strategic business goals. For example, in the current Delaware PSC proceeding examining dialing pattern issues for that state, the Diamond State Telephone Company has asserted proprietary status and confidential treatment for an important Bell Atlantic INPA planning document.¹⁰ If the RBOCs and Bellcore are behaving in

9/ Delaware Public Service Commission, Docket 92-47, Response of the Diamond State Telephone Company to Interrogatory No. OPA-1, Set 1, of OPA, dated January 21, 1993.

10/ Delaware Public Service Commission, Docket 92-47, Response of the Diamond State Telephone Company to Interrogatory No. MCI-1, Set 1, of MCI, dated January 21, 1993.

a neutral, unbiased manner as they would have the Commission and the other parties believe, then such confidential treatment of NANP documentation would not be expected.

3. The absence of consumer response to this NOI underscores the failure of Bellcore to adequately communicate important NANP issues and modification plans to the public.

The utter lack of consumer participation in this NOI should not go unnoticed by the Commission. Bellcore and its owners have been far less than forthcoming in disseminating information on INPA and other NANP issues to the general public, despite the fact that planning by the LECs for major revisions such as INPA began more than a decade ago. Bellcore and its owners will undoubtedly be quick to criticize the various non-LEC interests for their belated concerns about the costs and disruptions attendant to INPA implementation. However, as co-administrators of the NANP, Bellcore and its owners had a responsibility to afford all stakeholders the same planning horizon as the LECs have themselves enjoyed and, indeed, to have presented the various numbering plan options for public examination and comment long before the specific Bellcore/RBOC INPA plan was cast in stone.

While there was little direct discussion of INPA in the initial comments, the Committee nevertheless expects the LECs' responses to assert, inter alia, that because of the advanced stage of INPA implementation, any suggestions for revisions to INPA at this late date must be disregarded.¹¹ The Commission

^{11/} The Committee notes that similar responses were made by several LECs in their Phase II comments regarding CIC expansion. USTA, for example, states: "Exchange carrier filings in this docket confirm the substantial amount of
(continued...)"

cannot and should not condone this fait accompli theory of policymaking. The LECs should have addressed the various INPA issues — number assignment, dialing pattern, cost, timing, etc. — long before now. Yet despite a decade or more of planning on the LECs' part, they have waited until little more than 24 months before the INPA cutover date to first raise these issues at individual state PUCs. Moreover, these dialing plan initiatives — whether in the form of formal applications or informal discussions — are not even intended to achieve uniformity even within individual LEC territories.¹²

4. The costs — to all concerned — of specific NANP actions must be carefully and accurately determined before any particular NANP modifications are pursued.

Several parties addressed the question, raised in the NOI, as to the manner in which the costs of NANP administration should be shared among all industry participants. While the owners of Bellcore — the RBOCs — nominally incur the costs of NANPA as well as of their own intra-NPA number administration activities, these are flowed through to RBOC customers in the rates they charge for

11/(...continued)

time, resources, and expenses which exchange carriers have already utilized to begin implementing FGD CIC expansion. Since the exchange carrier industry has committed to CIC expansion, absent Commission intervention, exchange carriers can be expected to proceed to voluntarily implement it, based on demand, within a reasonable time frame. USTA at 2. Pacific states that it "support[s] the industry decision to move forward for Feature Group D CIC expansion and are already well underway in carrying out the changes necessary to accommodate this new carrier access code." Pacific at 1.

12/ Bell Atlantic, for example, is seeking or has adopted 7-digit HNPA dialing for both local and toll calling in Delaware, Pennsylvania and New Jersey; however, in Maryland and Virginia, the same RBOC has adopted the 11-digit Home Numbering Plan Area (HNPA) toll dialing format.

their various end user and access services. If, as the Committee and most other non-LEC parties have recommended, the NANPA function is transferred to a nonaffiliated entity, some alternate funding scheme will have to be developed. While the Committee agrees that these costs should be broadly shared, the Committee also notes that the direct costs of NANP administration are quite small by comparison with the totality of industry costs and revenues, and cautions that an unnecessarily complex funding system may engender substantial and largely unnecessary transaction costs whose effect would be to escalate the overall cost of NANPA well beyond its present level.

That having been said, the Committee is far more concerned that the focus on NANPA costs both in the NOI as well as in most of the initial comments may be seriously misplaced. Eclipsing the direct costs of the NANPA function are the potentially enormous costs that will fall upon individual NANP users arising out of any number changes. The Committee identified several of these cost sources in its Initial Comments.¹³ None of these costs are internal either to Bellcore or to its owners, and it is therefore not surprising that NANPA as well as the individual LECs persist in ignoring the costs and impacts to which NANP users will be subjected. Attachment 2 hereto highlights just one of the cost sources — the prices being quoted by AT&T for reprogramming and updating of AT&T PBXs to accommodate INPA. While NARUC expressed particular concern about such costs and impacts in its original Petition,¹⁴ and several non-LEC parties discussed the impact on themselves arising from NANP modifi-

13/ Ad Hoc Committee Initial Comments at 16-17.

14/ National Association of Regulatory Utility Commissioners, Petition for Notice of Inquiry Addressing Administration of the North American Numbering Plan, filed September 26, 1991.

cations both in their initial comments and in their reply comments in Phase II,¹⁵ no party other than the Ad Hoc Committee outlined the broad scope and magnitude of the general user/consumer burden. The comments filed by Bellcore and its owners, on the other hand, mirror their persistent disregard for the burdens their policies would impose upon their customers, competitors and other providers.

Finally, the Committee draws the Commission's attention to a study report commissioned and recently released by the United Kingdom Office of Telecommunications (OfTel) specifically addressing the cost and other impacts of the forthcoming (April, 1995) UK numbering change upon customer premises equipment. The OfTel study identified some £197-million in conversion and equipment replacement/upgrade costs.¹⁶ Extrapolating for the relative sizes of the two countries and converting to US funds, the OfTel results would imply a CPE impact in the US well in excess of \$1-billion. The prospect of imposing costs of this magnitude upon telecommunications users should not be lightly dismissed and, at the very least, deserves further study by the Commission before it is unilaterally — and perhaps unnecessarily — forced upon the already-weak US economy.

^{15/} See, e.g., Intellicall at 5-6; NATA at 4; APCC at 1.

^{16/} United Kingdom Office of Telecommunications, UK National code change Customer Premises Equipment Implications (1992), at 13.

5. The Commission should carefully study the long run cost of local number portability before it ventures into this unknown and untested territory.

In principle, the idea of "number portability" seems quite appealing. Like the name of an individual or a business, a telephone number comes to uniquely identify the residential or business customer to whom it has been assigned. The ability to control the assignment of telephone numbers affords the entity exercising this power considerable market advantage. The industry is in the final stages of implementation of "800 number portability" by the replacement of so-called "NXX" access with "database" access to 800 numbers. An 800 Service customer will soon be permitted to change his carrier without also accepting a number change; an 800 Service customer desiring a particular "vanity" number sequence will no longer be required to take the service from the interexchange carrier that happens to "own" the NXX code corresponding with the desired letter/number sequence. In a similar vein, local number portability will eliminate the ability of a LEC to leverage its control of number assignments so as to prevent its customers from changing carriers, if, as and when an alternative local exchange carrier becomes available.

Number portability clearly offers many important service opportunities and will likely contribute to a more competitive marketplace. However, notwithstanding its merits as an abstract matter, ubiquitous local number portability will not happen without significant cost, and the Commission should not make major technological commitments or adopt policies with significant costs and impacts without a comprehensive and accurate assessment as to their magnitude. The Committee notes, for example, that the Commission's initial adoption of 800 number

portability expressly relied upon explicit BOC representations as to the almost insignificant costs of its implementation:

All of the BOCs filed projected revenue requirements for data base 800 access service. According to these projections, the total interstate annual revenue requirement for 800 access service for the seven BOCs combined will be approximately \$20 Million.¹⁷

Moreover, even after it proposed, and subsequently imposed, certain additional requirements upon the BOCs with respect to coverage, post-dial delay, and other matters, no material cost impact beyond the previously-cited finding was identified by the Commission.¹⁸ Now, however, on the eve of actual implementation of 800 data base access, the BOCs seek to revise — and by a substantial amount — the cost assessment upon which the Commission's adoption of 800 number portability had been predicated. Extrapolating from a submission recently made to the FCC by Pacific Bell,¹⁹ the cost of 800 database access is now

17/ Provision of Access for 800 Service, CC Docket No. 86-10, 4 FCC Rcd 2824 (1989). Emphasis supplied, footnotes omitted.

18/ Id., Report and Order and Second Supplemental Notice of Proposed Rulemaking, 6 FCC Rcd 5421 (1991).

19/ See Pacific Bell ex parte filing dated December 28, 1992, in CC Docket 86-10, filed in support of the Company's position that the costs it incurs in implementing the 800 Database Service should be treated as exogenous Z-adjustments under the Commission's Price Cap system. In that filing, Pacific asserted that "[t]he SS7 investment and expense associated with the FCC mandated implementation of 800 Database Service will reach \$353M [million] by 1995. These costs have been incurred by Pacific in order to deploy an SS7 network that meets the Commission's access delay standards. In fact, Pacific has developed equipment and facilities specifically for 800 Database Service which offer capabilities previously unavailable in the network." Previously, that same RBOC had given this Commission a considerably lower assessment of 800 Database costs: "Dedicated 800 Data Base costs are relatively minor. The Commission has asked for comments concerning the projected costs of implementing and deploying (continued...)

being portrayed as amounting to more than \$2-billion through 1995.²⁰ With nearly one hundred times as many local and toll calls directed to ordinary NANP numbers as those dialed to '800' numbers, the price tag for "local number portability" could, on the basis of the BOCs' latest figures, easily top \$20-billion.

Significantly, proposals for local number portability are not demand driven in any meaningful sense. The actual extent of consumer interest in "portable" non-800 telephone number services is not known at this time,²¹ and in any event the extent of

19/ (...continued)

800 Data Base Service. The investment associated with the SCPs and the SMS are specific to 800 Data Base Service ... The total net investment for the SCPs and the SMS is approximately \$16 million. The related total expense for the initial implementation of the 800 data base plan through 1989 is approximately \$16 million. These costs translate into an initial interstate revenue requirement for 1989 of approximately \$3.7 million. This represents only 0.2 percent of Pacific Bell's 1.7 billion interstate revenue requirement ..." CC Docket No. 86-10, Comments, Pacific Bell comment, April 4, 1988, at 40-41. Emphasis in original, footnotes omitted.

20/ While the use of this extrapolation is necessarily limited to providing an order-of-magnitude collective picture of the BOCs' latest claims, the Ad Hoc Committee strongly disputes their veracity. Revised cost projections such as those proffered by Pacific are being advanced by the BOCs in support of rates that bear no relationship with the costs they had previously identified to the Commission and upon which the Commission expressly found 800 number portability to produce positive net benefits to the public. Without reiterating the Committee's specific challenges to the veracity of these "revised" cost estimates, their very existence as "after-the-fact" attempts to recover purported costs in excess of those upon which important technology decisions were based poses serious cause for concern. The Commission should demand accurate cost and impact projections before it launches a new technological initiative, and should hold the carriers responsible, after the fact, for those cost estimates when considering and approving specific rate treatment.

21/ AT&T's "Easy Reach" service and MCI's "Follow Me" personal 800 service are examples of such offerings; both currently have extremely small levels of market penetration.

such demand will certainly be influenced by price. There is no evidence that US consumers or business users want — or are willing to pay for — ubiquitous number portability at any price. Further, without comprehensive and accurate estimates of the total cost — to all sectors of the telecommunications industry — attendant to local number portability — there is no present means to determine that the benefits of ubiquitous number portability will exceed its costs, particularly for customers and applications where such an arrangement is not per se essential. Further, a distinction must be made between geographic portability (which specialized services like AT&T's "Easy Reach" and MCI's "Follow-Me 800" can support) and provider portability, in which a customer can change carrier without having to change telephone number. Indeed, despite the obvious interest of nascent local exchange competitors in this latter form of number portability, the Committee expects that their demand as well will be highly sensitive to price.

Indeed, to the extent that the desire for ubiquitous local number portability has already served to motivate INPA implementation and other fundamental NANP modifications,²² consumers and business telecommunications users are already being forced to incur costs, both within their own operations and through payments for LEC and other services, for a capability — ubiquitous number portability — the actual demand for which has

22/ Under the plan described in the Second Edition of Bellcore's Proposal on the Future of Numbering in World Zone 1, fully one-half of the four new NPA blocks that will be initially be made available (N2X, N3X, N8X and N9X) would be reserved for "portable" telephone numbers. The remaining four blocks (N4X, N5X, N6X and N7X) could be assigned either geographically or for portable applications, as demand warrants. Thus, as many as 75% of the new INPA codes could in principle be earmarked for "portable" non-geographic assignment.

never been demonstrated. If there is in fact a public demand for this new network capability, then that should be tested in the marketplace before costs are incurred and are unilaterally imposed upon telecommunications users.

While the Ad Hoc Committee does not oppose efforts to consider accommodating portable and other non-geographic number assignments within an expanded NANP, we urge the Commission to determine at the outset that the various NANP modifications being proposed and/or implemented at this time are driven by bona fide demands of the marketplace, and not merely by the strategic designs of the existing local exchange monopolies.

6. LECs should not be permitted to gain revenue and/or market advantage as a result of their present control of NANP resources.

Significantly, the LECs' professed interest in providing "portable" carrier-independent numbering is not reflected in ongoing business strategies that confer an undue competitive and market advantage upon LECs by virtue of their monopoly control of NANP resources. For example, one source of non-carrier interest in Feature Group B access is the ability to obtain a uniform 7-digit "local" type telephone number across a broad geographic area, or even on a nationwide basis. However, the LECs have tied this capability directly to their switched access service offering, because the only common CO code that is available in all US NPAs for this purpose is '950'.²³ There is no reason why customers who are not otherwise required to subscribe for

23/ In fact, Bellcore has proposed uniform ten-digit dialing for all local and toll calls within the NANP, with the exception of '950' numbers which would continue to be dialed on a seven digit basis.

switched access service²⁴ should be forced nevertheless to use it merely to obtain a uniform 7-digit number. Indeed, the apparent shortage of "CIC" codes, addressed by the parties responding to Phase II of this NOI, may well be explained by the interest in obtaining a uniform 7-digit national number rather than by specific interest in access services per se. New York Telephone recently introduced its "Circuit 9" Basic Serving Arrangement, offering 7-digit number uniformity across multiple NPAs.²⁵ However, like '950' Feature Group B access, the only means by which such number uniformity can be obtained is via this BSA, which is priced similarly to switched access, i.e., on an inward measured-use basis. Neither NYT nor, for that matter, any other LEC of which the Committee is aware, currently offers multi-NPA 7-digit uniform numbers except when tied to some other service which is priced on an inward measured-use basis.

There is no justification for LECs to "tie" their control of NANP resources to any specific service. If a uniform 7-digit numbering capability can be offered, it should be generally available with any applicable LEC service and at a price that reflects only the (relatively small) additional administrative costs associated with providing the special numbering arrangement. That such "tie-in" requirements are present underscores the concerns expressed by the Committee and others regarding the potential abuse by the LECs of the market advantage that their control of the NANP provides.

24/ See, Amendments of Part 69 of the Commission's Rules Relating to the Creation of Access Charge Subelements for Open Network Architecture, 6 FCC Rcd 4524, 4535 (1991).

25/ New York Telephone Information Letter dated December, 1992, "NYNEX Circuit 9SM Service."

7. The present NOI should be expanded to address specific NANP modifications and to propose specific rules and standards for full NANP uniformity.

The limited scope of the present NOI does not do justice to the myriad of issues that are engendered by impending and long range NANP changes. The Ad Hoc Committee urges the Commission to take the following specific actions at this time:

- (1) Expand the present NOI to include specific structural issues raised in Bellcore's Proposal on the Future of Numbering in World Zone 1 and by the various parties submitting comments thereto, including but not limited to the adoption of national numbering and dialing standards; and
- (2) Initiate a Notice of Proposed Rule Making to establish specific rules and procedures for INPA implementation and the adoption of common national standards for CO code assignment, dialing pattern, and NANP expansion.

Implementation of INPA is only 22 months away. Not later than the end of 1993, most NANP users will be forced to make the necessary provisions for the new dialing patterns and numbering rules. Delay in addressing and resolving these issues will impose an unreasonable and largely unnecessary economic burden upon US business and other organizations during a period of economic recovery when such waste can be least afforded.

The Ad Hoc Committee urges the Commission to proceed expeditiously, on an emergency basis, so that these issues can be resolved within the next six months.


Respectfully submitted,

**AD HOC TELECOMMUNICATIONS
USERS COMMITTEE**

Economic Consultant:

Dr. Lee L. Selwyn
Economics and Technology, Inc.
One Washington Mall
Boston, Massachusetts 02108
(617) 227-0900

By:


James S. Blaszak
Gardner, Carton & Douglas
1301 K Street, NW
Washington, D.C. 20005
(202) 408-7100

Its Attorney

February 24, 1993

Attachment 1

Compilation of dialing patterns in each NPA

Source: Delaware Public Service Commission, Docket 92-47,
Response of the Diamond State Telephone Company to
Interrogatory No. OPA-1, Set 1, of OPA, dated January
21, 1993.

**Response of The Diamond State Telephone Company to
Interrogatory No. OPA-1, Set 1, of OPA, dated January 21, 1993.**

Answer and Averred by: Charles H. Eppert, III

Position: Director - Technical Regulatory Analysis

**Request: Identify each telephone company over 400,000 lines
that (1) has seven digit dialing for toll calls, (2)
optional 10 or 11-digit dialing for local calls, or (3)
mandatory 10- or 11-digit dialing for local calls.**

Response:

**See the Bellcore chart provided in Attachment A, which
lists dialing procedures in use as of December, 1990. Subsequent
changes are included in Bellcore Information Letters attached in the
Company's response to Interrogatory No. OPA-2, Attachment A.**

Attachment A

Summary Of Reported Dialing Procedures In Use In The NANP

<u>Mandatory Dialing Procedures in Use</u>		<u>Operator Intervention Dialing Procedures in Use</u>	
7 Digit Home NPA calls	18	0 + 7 Digit HNPA calls	97
7 Digit <u>only non-toll</u> HNPA calls	117	0 + 7 Digit HNPA calls with timing	6
1 + 7 Digit HNPA <u>toll</u> calls	106	0 + 10 Digit HNPA calls	33
1 + 7 Digit HNPA calls <u>with timing</u>	0	0 + 10 Digit FNPA calls	130
1 + 10 Digit HNPA toll calls	12		
1 + 10 Digit <u>all</u> HNPA calls	0		
10 Digit HNPA calls	0		
10 Digit FNPA calls (MEA)	5		
1 + 10 Digit FNPA	130		
<u>Permissive Dialing Procedures</u>		<u>Permissive Operator Dialing Procedures</u>	
7 Digit Home HNPA calls	2	0 + 7 Digit HNPA calls	8
7 Digit <u>only non-toll</u> HNPA calls	1	0 + 7 Digit HNPA calls with timing	3
1 + 7 Digit HNPA <u>toll</u> calls	2	0 + 10 Digit HNPA calls	10
1 + 7 Digit HNPA calls <u>with timing</u>	0	0 + 10 Digit FNPA calls	4
1 + 10 Digit HNPA toll calls	8		
1 + 10 Digit <u>all</u> HNPA calls	6		
10 Digit HNPA calls	0		
10 Digit FNPA calls	1		
1 + 10 Digit FNPA (MEA)	3		

NUMBER PLAN AREA CODES
IN NUMERICAL ORDER
(as of July 1991)

ATTACHMENT B

AREA CODE	STATE/PROVINCE OR OTHER SPECIAL USE	AREA CODE	STATE/PROVINCE OR OTHER SPECIAL USE	AREA CODE	STATE/PROVINCE OR OTHER SPECIAL USE
201	New Jersey	416	Ontario	*710	U.S. Government
202	Dist. of Columbia	417	Missouri	712	Iowa
203	Connecticut	418	Quebec	713	Texas
204	Manitoba	419	Ohio	714	California
205	Alabama	501	Arkansas	715	Wisconsin
206	Washington	502	Kentucky	716	New York
207	Maine	503	Oregon	717	Pennsylvania
208	Idaho	504	Louisiana	718	New York
209	California	505	New Mexico	719	Colorado
*210	Unassigned	506	New Brunswick	800	800 Service
212	New York	507	Minnesota	801	Utah
213	California	508	Massachusetts	802	Vermont
214	Texas	509	Washington	803	South Carolina
215	Pennsylvania	*510	California (9/2/91)	804	Virginia
216	Ohio	512	Texas	805	California
217	Illinois	513	Ohio	806	Texas
218	Minnesota	514	Quebec	807	Ontario
219	Indiana	515	Iowa	808	Hawaii
301	Maryland	516	New York	*809	Bermuda, Puerto Rico
302	Delaware	517	Michigan		Virgin Islands & Other
303	Colorado	518	New York		Caribbean Islands
304	West Virginia	519	Ontario	*810	Unassigned
305	Florida	601	Mississippi	812	Indiana
306	Saskatchewan	602	Arizona	813	Florida
307	Wyoming	603	New Hampshire	814	Pennsylvania
308	Nebraska	604	British Columbia	815	Illinois
309	Illinois	605	South Dakota	816	Missouri
*310	California (11/2/91)	606	Kentucky	817	Texas
312	Illinois	607	New York	818	California
313	Michigan	608	Wisconsin	819	Quebec
314	Missouri	609	New Jersey	900	900 Service
315	New York	*610	Canada (TWX)	901	Tennessee
316	Kansas	612	Minnesota	902	Nova Scotia & Prince
317	Indiana	613	Ontario		Edward Island
318	Louisiana	614	Ohio	903	Texas
319	Iowa	615	Tennessee	904	Florida
401	Rhode Island	616	Michigan	*905	Ontario (10/3/93)
402	Nebraska	617	Massachusetts	906	Michigan
403	Alberta	618	Illinois	*907	Alaska
404	Georgia	619	California	908	New Jersey
405	Oklahoma	700	IC Services	*909	California (1993)
406	Montana	701	North Dakota	*910	Unassigned
407	Florida	702	Nevada	912	Georgia
408	California	703	Virginia	913	Kansas
409	Texas	704	North Carolina	914	New York
*410	Maryland (10/6/91)	705	Ontario	915	Texas
412	Pennsylvania	*706	Georgia (5/3/92)	916	California
413	Massachusetts	707	California	*917	New York (1992)
414	Wisconsin	708	Illinois	918	Oklahoma
415	California	709	Newfoundland	919	North Carolina

* NPA codes not included in the dialing plan survey (Attachment C)

MANDATORY DIALING PROCEDURES IN USE AS OF DECEMBER 1990

NPA Codes	201	202	203	204	205	206	207	208	209	212	213	214	215	216	217	218	219	301	302	303	304	305	306	307	308	309	312	313	314	315	316	317	318	319
	*	*			*	(1)				*	*	*	(2)					*									*	*						
7 Digit Home NPA calls	x	x								x	x																x							
7 Digit <u>only non-toll</u> HMPA calls			x	x	x	x	x	x	x			x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	
1 + 7 Digit HMPA <u>toll</u> Calls			x	x		x	x	x	x				x	x	x	x	x		x	x	x	x	x	x	x	x			x	x	x	x	x	
1 + 7 Digit HMPA calls <u>with timing</u>																																		
1 + 10 Digit HMPA toll calls					x							x						x										x						
1 + 10 Digit <u>all</u> HMPA calls																																		
10 Digit HMPA calls																																		
10 Digit FNPA calls (MEA)			x									x						x																
1 + 10 Digit FNPA	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	

PERMISSIVE DIALING PROCEDURES IN USE AS OF DECEMBER 1990

NPA Codes	201	202	203	204	205	206	207	208	209	212	213	214	215	216	217	218	219	301	302	303	304	305	306	307	308	309	312	313	314	315	316	317	318	319
	*	*			*	(1)				*	*	*	(2)					*									*	*						
7 Digit Home NPA calls			x																															
7 Digit <u>only non-toll</u> HMPA calls																																		
1 + 7 Digit HMPA <u>toll</u> Calls																																		
1 + 7 Digit HMPA calls <u>with timing</u>																																		
1 + 10 Digit HMPA toll calls																																		
1 + 10 Digit <u>all</u> HMPA calls	x		x																															
10 Digit HMPA calls																																		
10 Digit FNPA calls																																		
1 + 10 Digit FNPA (MEA)			x															x																

MEA: Metropolitan Exchange Area

(*) : Indicates interchangeable CO codes

(1) 206 NPA - interchangeable codes scheduled for 1/12/92 (See IL 91/01-045)

(2) 215 NPA - interchangeable codes scheduled for 5/20/91 (See IL 90/07-004)

OPERATOR INTERVENTION DIALING PROCEDURES IN USE AS OF DECEMBER 1990

NPA Codes	201	202	203	204	205	206	207	208	209	212	213	214	215	216	217	218	219	301	302	303	304	305	306	307	308	309	312	313	314	315	316	317	318	319
	*	*			*	(1)				*	*	*	(2)					*									*	*						
0 + 7 Digit NPA calls			x	x		x	x	x						x	x	x	x			x	x	x	x	x	x	x			x	x	x	x	x	
0 + 7 Digit NPA calls with timing													x						x															
0 + 10 Digit NPA calls	x	x	x		x					x	x	x	x					x	x									x	x					
1 + 10 Digit FNPA calls	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	x	

PERMISSIVE OPERATOR DIALING INTERVENTION PROCEDURES AS OF DECEMBER 1990

NPA Codes	201	202	203	204	205	206	207	208	209	212	213	214	215	216	217	218	219	301	302	303	304	305	306	307	308	309	312	313	314	315	316	317	318	319
	*	*			*	(1)				*	*	*	(2)					*									*	*						
0 + 7 Digit NPA calls			x						x																									
0 + 7 Digit NPA calls with timing												x																						
0 + 10 Digit NPA calls			x																			x												
0 + 10 Digit FMPA calls			x																															

(*) Indicates interchangeable CO codes

(1) 206 NPA - interchangeable codes scheduled for 1/12/92 (See IL 91/01-045)

(2) 215 NPA - interchangeable codes scheduled for 5/20/91 (See IL 90/07-004)

MANDATORY DIALING PROCEDURES IN USE AS OF DECEMBER 1990

ATTACHMENT C

NPA Codes	401	402	403	404	405	406	407	408	409	412	413	414	415	416	417	418	419	501	502	503	504	505	506	507	508	509	512	513	514	515	516	517	518	519
				*									*	*													*							
7 Digit Home NPA calls								X		X			X																				X	
7 Digit <u>only non-toll</u> HMPA calls	X	X	X	X	X	X	X	X	X	X		X	X		X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X
1 + 7 Digit HMPA <u>toll</u> Calls	X	X	X		X	X	X	X	X		X	X			X	X	X	X	X	X	X	X	X	X	X	X		X	X	X	X	X	X	X
1 + 7 Digit HMPA calls <u>with timing</u>																																		
1 + 10 Digit HMPA toll calls					X									X													X							
1 + 10 Digit <u>all</u> HMPA calls																																		
10 Digit HMPA calls																																		
10 Digit FMPA calls (NEA)																																		
1 + 10 Digit FMPA	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X

PERMISSIVE DIALING PROCEDURES IN USE AS OF DECEMBER 1990

NPA Codes	401	402	403	404	405	406	407	408	409	412	413	414	415	416	417	418	419	501	502	503	504	505	506	507	508	509	512	513	514	515	516	517	518	519
				*									*	*													*							
7 Digit Home NPA calls								x																										
7 Digit <u>only non-toll</u> HMPA calls								x																										
1 + 7 Digit HMPA <u>toll</u> Calls								x																									x	
1 + 7 Digit HMPA calls <u>with timing</u>																																		
1 + 10 Digit HMPA toll calls								x																										
1 + 10 Digit <u>all</u> HMPA calls				x																														
10 Digit HMPA calls																																		
10 Digit FMPA calls																																		x
1 + 10 Digit FMPA (NEA)																																		

NEA: Metropolitan Exchange Area